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8 Attorneys for the United States

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10
11 IN THE UNITED STATES DISTRICT COURT
12 EASTERN DISTRICT OF CALIFORNIA

13 UNITED STATES OF AMERICA,

14 Plaintiff,

15 v.

16 APPROXIMATELY \$269,565.50 SEIZED FROM
17 FIRST RELIANCE BANCSHARES, INC.
18 ACCOUNT NUMBER 5220000969, HELD IN THE
19 NAME OF LIFESTYLE DEVELOPMENT, LLC,

20 APPROXIMATELY \$1,373.95 SEIZED FROM
21 VALLEY NATIONAL BANK ACCOUNT
22 NUMBER 8843534202, HELD IN THE NAME OF
23 LIFESTYLE DEVELOPMENT, LLC,

24 APPROXIMATELY \$7,982.56 SEIZED FROM
25 FIRST RELIANCE BANCSHARES, INC.
26 ACCOUNT NUMBER 5210000745, HELD IN THE
27 NAME OF THOMAS EIDE,

28 APPROXIMATELY \$50,000.00 SEIZED FROM
MAINSTREET BANK ACCOUNT NUMBER
2010039009, HELD IN THE NAME OF PRV
INTERNATIONAL, LLC,

APPROXIMATELY \$36,650.38 SEIZED FROM
BANK OF AMERICA, N.A. ACCOUNT NUMBER
383019458700, HELD IN THE NAME OF
VITAKEM NUTRA, AND

2:24-MC-00402-DJC-SCR

STIPULATION AND ORDER EXTENDING
TIME FOR FILING A COMPLAINT FOR
FORFEITURE AND/OR TO OBTAIN AN
INDICTMENT ALLEGING FORFEITURE

1 APPROXIMATELY \$37,886.31 SEIZED FROM
2 SOUTHSTATE BANK, NA ACCOUNT NUMBER
3 8010002012630, HELD IN THE NAME OF
SARAH NICK,

4 Defendants.

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6 It is hereby stipulated by and between the United States of America and potential claimants
7 Thomas Eide on behalf of himself and Lifestyle Development, LLC, by and through their respective
8 counsel, and Erick Reyes-Villa as representative for PRV International, LLC (“claimants”), as follows:

9 1. On or about May 7, 2024, the U.S. Postal Inspection Service (“USPIS”) seized the above-
10 referenced defendant funds pursuant to Federal seizure warrants (hereafter collectively “defendant
11 funds”).

12 2. Under 18 U.S.C. §§ 983(a)(1)(A)(i)-(iv), and 983(a)(3)(A), the United States is required to
13 send notice to potential claimants, file a complaint for forfeiture against the defendant funds, or obtain an
14 indictment alleging that the defendant funds are subject to forfeiture within one hundred and fifty days of
15 seizure, unless the court extends the deadline for good cause shown or by agreement of the parties. That
16 deadline was October 4, 2024.

17 3. By Stipulation and Order filed October 9, 2024, the parties stipulated to extend to January
18 2, 2025, the time in which the United States is required to file a civil complaint for forfeiture against the
19 defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture.

20 4. By Stipulation and Order filed January 6, 2025, the parties stipulated to extend to April 2,
21 2025, the time in which the United States is required to file a civil complaint for forfeiture against the
22 defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture.

23 5. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to July
24 1, 2025, the time in which the United States is required to file a civil complaint for forfeiture against the
25 defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture.

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6. Accordingly, the parties agree that the deadline by which the United States shall be required to file a complaint for forfeiture against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture shall be extended to July 1, 2025.

Dated: 4/2/2025

MICHELE BECKWITH
Acting United States Attorney

By: /s/ Kevin C. Khasigian
KEVIN C. KHASIGIAN
Assistant U.S. Attorney

Dated: 4/1/2025

/s/ Daniel Olmos

DANIEL OLMOS

Dated: 4/1/2025

/s/ Erick Reyes-Villa

ERICK REYES-V

Potential Claimant on b

PRV International, LLC

Appearing *in propria persona*

1055 Thomas Jefferson Street N
Washington, DC 20007
(Signature authorized by email)

IT IS SO ORDERED.

Dated: April 4, 2025

/s/ Daniel J. Calabretta

THE HONORABLE DANIEL J. CALABRETTA
UNITED STATES DISTRICT JUDGE